

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
:   
Derrick A. Spruel, Sr. :  
Virginia B. Spruel :  
Debtors : No. 18-10689-AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtors, by attorney David M. Offen, make the following Motion to Modify Plan After Confirmation and in support hereof state as follows:

1. Debtors filed a Chapter 13 Petition and Plan with this Court on February 1, 2018.
2. The debtors' Amended Plan provided for a base plan in the amount of \$44,550.00 to be paid in over a 60 month period.
3. The debtors' plan was confirmed on February 8, 2019.
4. Internal Revenue Service filed an Amended Proof of Claim on January 17, 2020 in the amount of \$3,982.72.
5. The debtors surrendered their 2014 GMC Terrain and Capital One Auto Finance amended their claim to mark the debt as unsecured.
6. The debtor has paid a total of \$22,777.00 into the Chapter 13 Trustee over 29 months.
7. The debtors' modified plan will provide for monthly payments in the amount of \$1,000.00 and continuing for 17 months for a total base amount of \$39,777.00.
8. Debtors respectfully request their Chapter 13 plan to be modified in consideration of the Amended Proofs of Claims of Internal Reveue Service and Capital One Auto Finance.

WHEREFORE, Debtors, by Attorney, respectfully requests

that Your Honorable Court enter an Order to reflect that the Modified Chapter 13 Plan attached hereto as Exhibit "A" is hereby approved with a new base amount of \$39,777.

/s/ David M. Offen  
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Date: 7/2/20